

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Amendment of Section 73.202 (b))	MM Docket No. 96-176
Table of Assignments,)	RM-8851
FM Broadcast Stations)	
Greensboro, Alabama)	

To: Chief, Policy and Rules Division

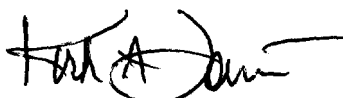
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Comments of Houston L. Pearce

Houston L. Pearce, (hereinafter "Pearce"), by his consultant, and pursuant to Section 1.415 and 1.420 of the Commission's Rules and Regulations, hereby respectfully submits five original copies of his comments in support of the Commission's Notice of Proposed Rule Making ("NPRM"), DA 96-1419, released August 30, 1996 in the above captioned proceeding.

Pearce respectfully submits that the public interest, convenience, and necessity would be furthered by the allotment of FM Channel 256A to Greensboro, Alabama as that communities first local transmission outlet. Houston L. Pearce intends to apply for, and if granted, promptly construct a new FM facility in Greensboro, Alabama.

Respectfully Submitted,



Kirk A. Tollett
Consultant to Houston L. Pearce

Commsouth Media, Inc.
P.O. Box 810
Crossville, Tennessee 38557-0810
(615)456-4656
October 17, 1996

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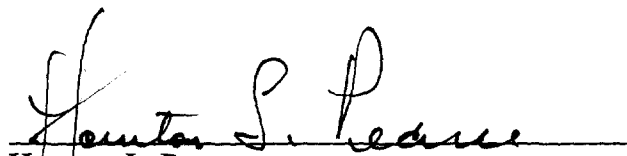
DECLARATION

I, Houston L. Pearce, hereby certify that:

1. That I am a citizen of the United States and of the State of Alabama.
2. I hereby file supporting comments requesting the Federal Communications Commission to allocate FM Radio Channel 256A (99.1 MHz) to the community of Greensboro, Alabama.
3. I have retained Kirk A. Tollett and Commsouth Media, Inc., to assist me in the preparation and filing of the required technical exhibits to facilitate the afore mentioned Comments.
4. If FM Channel 256A or an equivalent channel is allocated to Greensboro, Alabama, I will promptly apply; either individually or as an entity of which I am a part, for a construction permit to operate the new FM broadcast station. If a construction permit is granted, I or an entity of which I am a part, will promptly construct and operate the station for which I am licensed.
5. I have reviewed the attached "Comments of Houston L. Pearce" and find all statements contained therein, true and correct to the best of my knowledge and belief.

I hereby certify under penalty of perjury that the above statement is true.

Signed and dated this 12th day of October, 1996


Houston L. Pearce
142 Skyland Blvd.
Tuscaloosa, Alabama 35405
(205)345-7200

TECHNICAL STATEMENT
In support of
COMMENTS IN MM DOCKET 96-176
Houston L. Pearce
Greensboro, Alabama
October, 1996

INTRODUCTION

This technical statement has been prepared on behalf of Houston L. Pearce, in support of his Comments in Mass Media Docket 96-176, Rule Making 8851 in which the FCC is considering a change in the FM Table of Assignments, Paragraph 73.202(b) of the FCC Rules as follows:

City	Channel Number	
	Present	Proposed
Greensboro, Alabama		256A

As can be gleaned from the attached Figures, Channel 256A can be added to the Federal Communications Commission Table of Assignments with out the necessity of any other changes and without the creation of any new preclusion area.

DISCUSSION

Figure 1, is a computer generated allocation study using the Commission's specified method of distance computations, demonstrating the assignability of FM Channel 256A to Greensboro, Alabama. The information contained in Figure 1, was utilized to determine the Clearance Area outlined in Figure 2.

Figure 2 is a computer generated 1:500,000 map, the center of which represents the reference coordinates utilized in the preparation of this Report. The geographic coordinates selected for this study were:

N 32° 47' 22"

W 87° 34' 39"

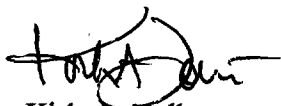
Figure 2, details the area of Greensboro and the pertinent arcs from all co-channel as well as adjacent channel facilities, allocated, assigned or operational within 300 kilometers of the proposed allocation. Based on Figure 2 it is believed that there is ample clearance area (highlighted in yellow) to locate a tower site that would place the required unobstructed city grade signal, (70 dBu), over the entire Community of Greensboro, Alabama. Figure 3 demonstrates the calculated city grade signal (70 dBu) of the proposed facility utilizing a hypothetical tower, with a center of radiation 100 meters above average terrain and an effective radiated power of six kilowatts from the reference coordinates used in the Commissions NPRM.

CONCLUSION

Based on this information, and the figures that are included in this Report, we believe that the proposed assignment would be in full compliance with the Federal Communications Commission's Rules, and that Channel 256A could be assigned to Greensboro, Alabama as that communities first local broadcast service.

Therefore, Houston L. Pearce, respectfully requests amendment of the Commission's Table of Assignments, Section 73.202(b), and will promptly apply for a construction permit, should the Federal Communications Commission make the requested assignment.

Respectfully,



Kirk A. Tollett
Consultant to Houston L. Pearce
October 17, 1996

FIGURE 1

FM SEPARATION STUDY

HOUSTON L. PEARCE

NEW-FM, CHANNEL 256A

GREENSBORO, ALABAMA

FM search of channel 256A6 (99.1 MHz), at N. 32 47 22, W. 87 34 39.

Searching Channel 256A6 (99.1 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
WAPR	Selma	AL	202	C	L	106.2	28.0	132.6°	78.2
WINL	Linden	AL	253	C1	L	75.0	75.0	191.3°	0.0
ALC	Warrior	AL	254	C2	U	125.3	55.0	43.3°	70.3
WBHK	Warrior	AL	254	C1	A	127.6	75.0	34.2°	52.6
WBHK	Warrior	AL	254	C2	C	125.3	55.0	43.3°	70.3
ALC	Montgomery	AL	255	C2	U	136.5	106.0	108.3°	30.5
WBAMFM	Montgomery	AL	255	C1	A	149.2	133.0	113.8°	16.2
WBAMFM	Montgomery	AL	255	C2	L	136.5	106.0	108.3°	30.5
ALC	Quitman	MS	255	C3	U	137.3	89.0	232.4°	48.3
ALC	Brooksville	MS	255	C3	U	109.7	89.0	309.0°	20.7
WAJV	Brooksville	MS	255	C3	L	109.4	89.0	304.2°	20.4
WYKKFM	Quitman	MS	255	A	L	134.6	72.0	233.3°	62.6
WYKKFM	Quitman	MS	255	C3	C	134.5	89.0	233.3°	45.5
ALC	Greensboro	AL	256	A	A	0.0	115.0	0.0°	-115.0
ALC	Huntsville	AL	256	C	U	239.1	226.0	21.3°	13.1
WAHR	Huntsville	AL	256	C	L	239.1	226.0	21.3°	13.1
ALC	Greenwood	MS	256	C	U	275.2	226.0	288.5°	49.2
ALC	Pascagoula	MS	256	C1	U	277.3	200.0	202.9°	77.3
WKNNFM	Pascagoula	MS	256	C1	L	277.3	200.0	202.9°	77.3
WYMX	Greenwood	MS	256	C	L	275.2	226.0	288.5°	49.2
ALC	Monroeville	AL	257	C2	U	143.8	106.0	169.5°	37.8
WMFCFM	Monroeville	AL	257	C2	L	143.8	106.0	169.5°	37.8
ALC	Birmingham	AL	258	C	U	97.1	95.0	41.9°	2.1
WZRR	Birmingham	AL	258	C1	L	97.1	75.0	41.9°	22.1
WZRR	Birmingham	AL	258	C	C	100.9	95.0	42.3°	5.9

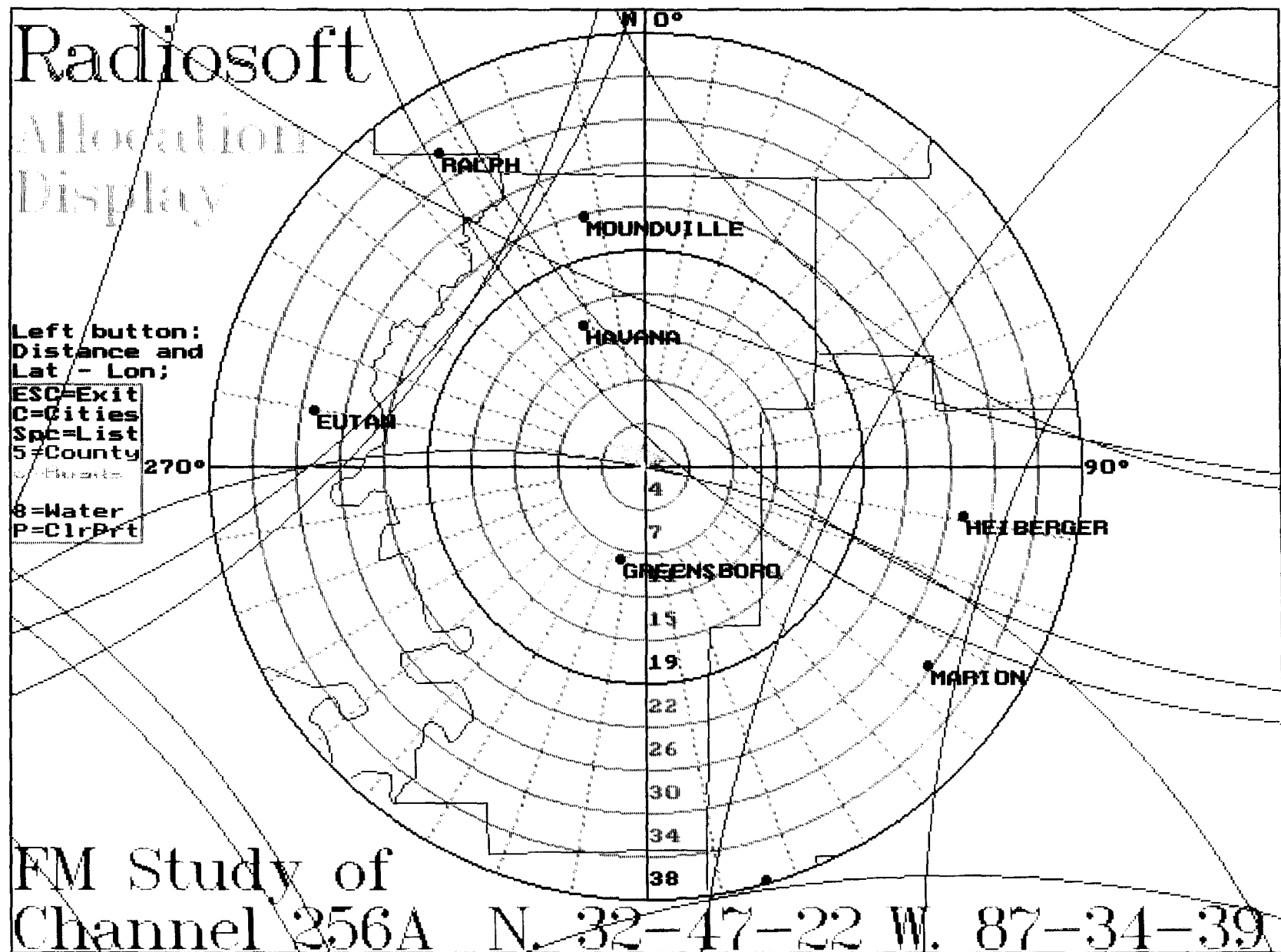


FIGURE 2
FM SEPARATION STUDY MAP
NEW-FM CHANNEL 256A
GREENSBORO, ALABAMA

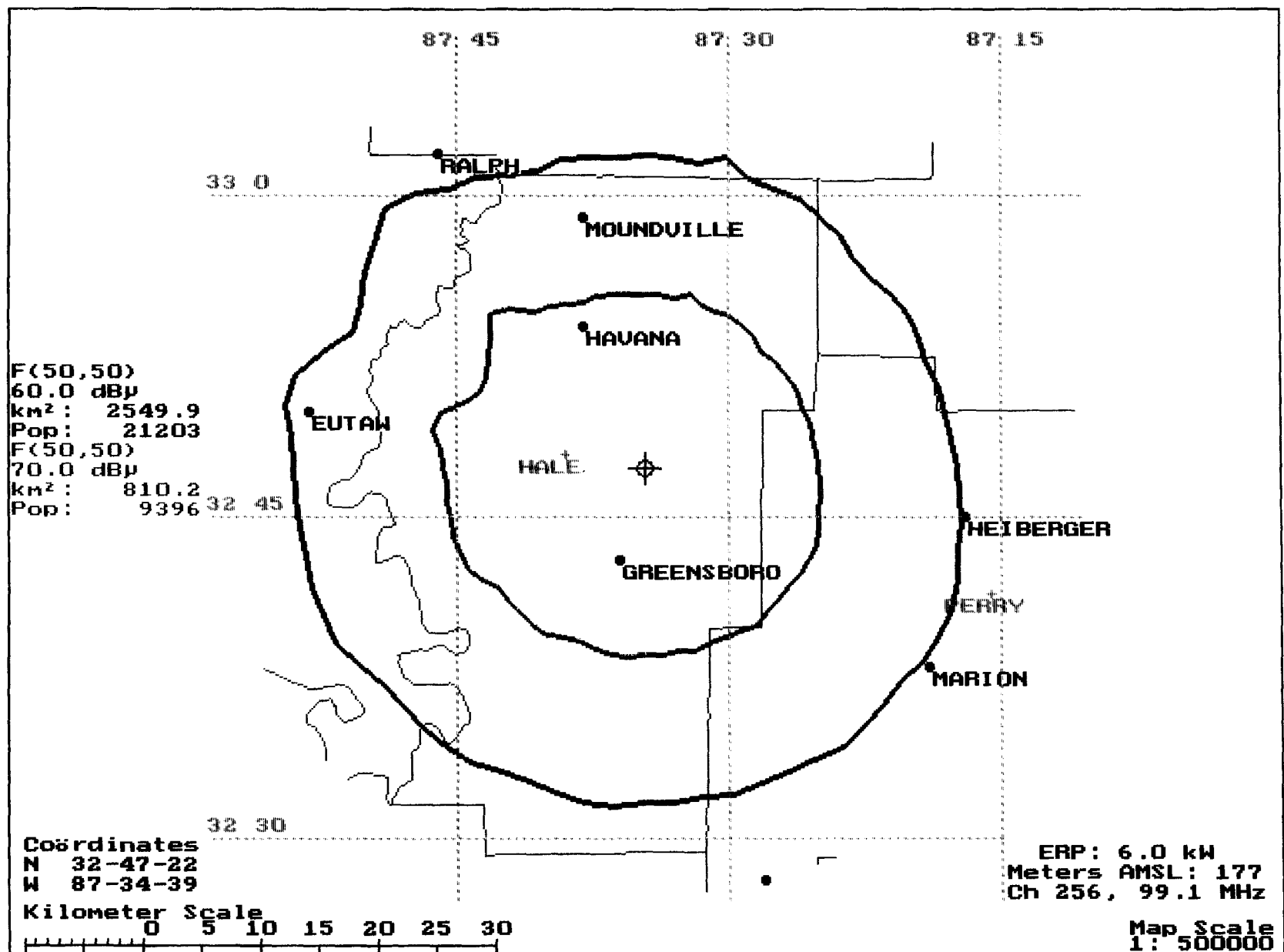


FIGURE 3
COVERAGE CONTOURS
NEW-FM CHANNEL 256A
GREENSBORO, ALABAMA

CERTIFICATION

Kirk A. Tollett hereby certifies that;

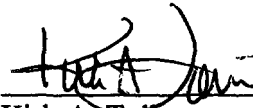
He is President of Commsouth Media, Inc., a broadcast consulting firm based in Crossville, Tennessee;

His qualifications in broadcast matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions over the past nineteen years;

That he has been retained by Houston L. Pearce, for the purpose of developing technical exhibits and analyses of which this certification is a part;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

Signed and dated this 17th day of October, 1996

A handwritten signature in black ink, appearing to read 'Kirk A. Tollett', is written over a horizontal line.

Kirk A. Tollett
Commsouth Media, Inc.
P.O. Box 810
Crossville, Tennessee 38557-0810
(615)456-4656

CERTIFICATE OF SERVICE

The undersigned certifies that copies of the foregoing Comments were served by first class mail, postage prepaid on the following persons on the date indicated:

Autaugaville Radio, Inc.
Attn: Roscoe J. Miller
Manningham Road at I-65
P.O. Box 369
Greenville, AL 36037

Additionally, an original and five copies were sent this day by Federal Express, next business day delivery to:

Secretary,
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554


Kirk A. Tollett

Dated: October 18, 1996